

### **REMARKS**

Claims 1-5 and 7-23 are presently pending, of which claims 1, 12 and 23 are independent. Claim 1 has been amended. No new matter has been added. Applicant believes that the claims are patentable and in condition for allowance as discussed below. Applicant respectfully requests reconsideration of the outstanding rejections in view of the comments set forth below.

#### **I. Claim Rejections**

Claims 1-5 and 7-11 have been rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter.

Claims 1-5 and 7-23 have been rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent Number 6,957,191 to Belcsak et al (hereafter “Belcsak”) in view of U.S. Patent Number 7,015,911 to Shaughnessy et al (hereafter “Shaughnessy”).

#### **II. Claim Rejections under 35 U.S.C. §101**

Claims 1-5 and 7-11 have been rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter (Office Action, page 2, § 3).

The Examiner indicates that claims 1-5 and 7-11 reflect process claims but a process must (1) be tied to another statutory class (such as a particular apparatus) or (2) transform the underlying subject matter to a different state or thing *In re Bilski* (Office Action, page 2, § 3).

Applicant amends claim 1 to recite “a computer-implemented method.” Claim 1 is further amended to recite “performing, using the computer, an analysis or synthesis operation on a graphical model representation.” Claim 1 is also amended to recite “displaying elements of the report corresponding to the selected graphical object in response to the selection on a display device.” Amended claim 1 recites a process tied to a particular apparatus, i.e. a computer. Accordingly, Applicant believes that the amendments address the Examiner’s concerns. Claims 2-5 and 7-11 depend from claim 1 and, as such, incorporate each and every element of claim 1.

Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 1-5 and 7-11 under 35 U.S.C. § 101.

### III. Claim Rejections under 35 U.S.C. §103(a)

Claims 1-5 and 7-23 have been rejected under 35 U.S.C. §103(a) as being obvious over Belcsak in view of Shaughnessy (Office Action, page 3, § 5). Applicant respectfully traverses the rejection.

#### A. Claim 1

Claim 1 recites:

“A computer-implemented method comprising:  
performing, using the computer, an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;  
producing a report from the analysis or synthesis operation;  
**associating one or more tags with one or more graphical objects of the graphical model representation;**  
**associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object;**  
receiving a selection of a graphical object in the graphical model representation; and  
**displaying elements of the report corresponding to the selected graphical object in response to the selection on a display device.”**

Belcsak and Shaughnessy, alone or in any reasonable combination, do not disclose or suggest **associating one or more tags with one or more graphical objects of the graphical model representation** and **associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object**, as recited in Applicant’s claim 1.

The Examiner correctly indicates that Belcsak does not expressly teach **associating one or more tags with one or more graphical objects of the graphical model representation** and **associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object**, as recited in Applicant’s claim 1. However, the Examiner asserts that Shaughnessy teaches these claim elements. Applicant respectfully disagrees. Shaughnessy discusses associating two graphical objects. However,

Shaughnessy is silent about *associating one or more tags with one or more graphical objects* and *associating one or more tags with portions of the produced report*. In addition, the graphical objects of Shaughnessy are produced from the data used to generate the report. In contrast, Applicant's claim 1 recites producing a report from the analysis of a graphical model representation.

Shaughnessy discusses generating reports from a plurality of data sources (Col. 1, lines 37-38). The system and method of Shaughnessy include a data source specification to indicate the data to be retrieved from the data sources so that the report may be generated based upon the extracted data. A view specification indicates how the data is to be visually represented within the report (Col. 1, lines 38-43). The report changes as the underlying data changes (Col. 2, lines 11-12).

The Examiner refers to Figure 6 and related text of Shaughnessy to assert that Shaughnessy teaches associating tags with a graphical object of the graphical model representation and associating these tags with portions of the produced report corresponding to the graphical object (Office Action, page 5, first ¶). Applicant respectfully submits that these cited sections of Shaughnessy merely discuss a hierarchical structure in Shaughnessy's report. Shaughnessy is silent about **associating one or more tags with one or more graphical objects of the graphical model representation** and **associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object**, as recited in Applicant's claim 1.

Specifically, the Examiner asserts that Shaughnessy teaches a template for displaying data where XML tags are used to associate *a visual data object* to *another data item* in Col. 3, lines 45-55. However, the cited section of Shaughnessy merely indicates that the XML format permits tags to show how **one data item** relates to **another data item**, such as what data item is contained within another data item in the XML hierarchy (Col. 3, lines 45-48). There is no discussion of **associating one or more tags with one or more graphical objects of the graphical model representation** and **associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object**, as recited in Applicant's claim 1. Shaughnessy merely discusses how one data item relates to another data item, without indicating if the data items are associated with graphical

objects of a graphical model representation. In fact, there is no graphical model representation in Shaughnessy. Shaughnessy only concerns associations among *data items*.

Moreover, Figure 6 of Shaughnessy merely illustrates a report 200 and a graphical representation 208 of the data that is used to generate the report 200. In Shaughnessy, the graphical representation 208 itself is generated from the data used to generate the report 200. In contrast, Applicant's claim 1 recites *producing a report from the analysis or synthesis operation on a graphical model representation that includes at least one graphical object*. Specifically, it is not clear if the Examiner interprets the graphical representation 208 illustrated on Figure 6 of Shaughnessy as being equivalent to the graphical representation recited in Applicant's claim 1. Even then, nowhere in the document does Shaughnessy disclose or suggest **associating one or more tags with one or more graphical objects of the graphical model representation and associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object**, as recited in Applicant's claim 1.

The Examiner further alleges that Belcsak teaches **displaying elements of the report corresponding to the selected graphical object in response to the selection** (Office Action, page 4). Applicant respectfully disagrees. The Examiner asserts that Belcsak teaches the user can click on an item and the system shows the user more information about the object, which also includes a menu item that can link the user to the report item as shown in Figure 12, where the diagram is on the left and the report is on the right (Office Action, page 4, first ¶). However, Figure 12 of Belcsak illustrates information that is automatically generated in the reports chapter 74 in response to creation of the graphical party diagram in the payment diagram chapter 50 (Col. 18, lines 52-55). As such, there is no "selected graphical object" or "**elements of the report corresponding to the selected graphical object in response to the selection**" in Belcsak. Belcsak displays the entire report that corresponds to the payment diagram.

Furthermore, the Examiner asserts that Belcsak specifically shows the GUI allows the user to create party graphics respectively representing financial parties in a scenario wherein each graphic connects two of the party graphics, which in the Examiner's opinion is an association (Office Action, page 4, first ¶). Applicant respectfully submits that associating two graphical objects as taught by Belcsak in the Examiner's opinion is different than associating tags with graphical objects. As correctly indicated by the Examiner, Belcsak does not teach

associating one or more tags with a graphical object of the graphical model representation, as claimed by the Applicant.

Accordingly, for at least the reasons presented above, Belcsak and Shaughnessy, alone or in any reasonable combination, do not disclose or suggest each and every element of claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

#### B. Claims 2-5 and 7-11

Claims 2-5 and 7-11 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-5 and 7-11 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-5 and 7-11 under 35 U.S.C. § 103(a).

#### C. Claims 12-22

Claim 12 recites:

“A system comprising:

means for performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;

means for producing a report from the analysis or synthesis operation;

**means for associating one or more tags with one or more graphical objects of the graphical model representation;**

**means for associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object;**

means for receiving a selection of a graphical object in the graphical model representation; and

means for displaying elements of the report corresponding to the selected graphical object in response to the selection.”

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak and Shaughnessy, alone or in any reasonable combination fails to disclose or suggest **associating one or more tags with one or more graphical objects of the graphical model representation;** and **associating the one or more tags associated with a graphical**

**object with portions of the produced report corresponding to the graphical object**, as recited in Applicant's claim 12.

Claims 13-22 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-22 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully request the Examiner to reconsider and withdraw the rejection of claims 12-22 under 35 U.S.C. § 103(a).

D. Claim 23

Claim 23 recites:

“A computer program product residing on a computer readable medium having instructions stored thereon which, when executed a processor, cause the processor to:

perform an analysis or synthesis operation on a graphical model representation, the graphical model representation including at least one graphical object;

produce a report from the analysis or synthesis operation;

**associate one or more tags with one or more graphical objects of the graphical model representation;**

**associate the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object;**

receive a selection of a graphical object in the graphical model representation; and

display elements of the report corresponding to the selected graphical object in response to the selection.”

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak and Shaughnessy, alone or in any reasonable combination fails to disclose or suggest **associating one or more tags with one or more graphical objects of the graphical model representation; and associating the one or more tags associated with a graphical object with portions of the produced report corresponding to the graphical object.**

Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 103(a).

**CONCLUSION**

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

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Respectfully submitted,

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